

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 28421, 28776, 28784, 28814, 28816,
28830, 28831, 28832, 28833, 28835, 28836, 28837,
28838, 28846, 28847 & 29191

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435], entered January 9, 2023 (the “Interim Compensation Order”) and the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834], entered March 8, 2023 (the “Fee Examiner Order”), those professionals listed on **Exhibit 1** to the proposed form of omnibus order (the “Proposed Order”) attached hereto as **Exhibit A** (each, an “Applicant” and collectively, the “Applicants”) filed their interim fee applications [Docket Nos. 28421, 28776, 28784, 28814, 28816, 28830, 28831, 28832, 28833, 28835, 28836, 28837, 28838, 28846, 28847 & 29191] (the “Interim

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

Applications”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Objections to each of the Interim Applications, if any, were to be filed and served no later than the objection deadline set forth on each of the Interim Applications in accordance with the Interim Compensation Order (as applicable, the “Objection Deadline”), the last of which expired on January 6, 2025. The hearing to consider approval of the Interim Applications is currently scheduled for March 13, 2025 at 1:00 p.m. (ET).

3. Pursuant to the Fee Examiner Order, Katherine Stadler, (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Fee Review Process and Eighth Interim Fee Applications* [D.I. 29857] (the “Fee Examiner Report”) with respect to each of the Interim Applications subject to review pursuant to the Fee Examiner Order, recommending the approval of fees and expenses requested in the Interim Applications with certain agreed upon reductions.³

4. Certain professionals are continuing discussions with the Fee Examiner with regard to their pending Interim Applications.⁴ Thus, these Interim Applications are not included on the Proposed Order attached hereto.

5. The undersigned hereby certifies that the Court’s docket has been reviewed and no answer, objection, or other responsive pleading to the Interim Applications, other than the Fee Examiner Report appear thereon.

6. Given the lack of objections to the approval of the Interim Applications, the FTX Recovery Trust prepared the Proposed Order approving the Interim Applications.

³ Pursuant to paragraph 3(iv) of the Fee Examiner Order, flat-fee professionals are not subject to Fee Examiner review on an interim basis. The Fee Examiner has advised that the Fee Examiner neither endorses nor objects to the interim fee requests of Perella Weinberg Partners LP, Jefferies LLC and Rothschild & Co US Inc.

⁴ Pursuant to the *Fee Examiner’s Summary Report on Fee Review Process and Eighth Interim Fee Applications* [D.I. 29857], Sullivan & Cromwell LLP and the Fee Examiner have agreed to defer consideration of Sullivan & Cromwell LLP’s Eighth Fee Application to the omnibus hearing on April 19, 2025.

7. A copy of the Proposed Order approving the Interim Applications has been circulated to the Applicants, the Fee Examiner, the U.S. Trustee and the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (collectively, the “Parties”). The Parties have advised that they do not oppose entry of the Proposed Order.

8. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully request the Proposed Order be entered at the Court’s earliest convenience.

Dated: March 11, 2025
Wilmington, Delaware

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